

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

JOAN RAIDER RAWLINGS,

Debtors.

Case No. 21-10025-TWD

Chapter: 13

DEBTOR'S EX PARTE MOTION FOR
AN ORDER APPROVING
COMPROMISE OF CLAIM

COMES NOW, the Debtor Joan Raider Rawlings ("Debtor"), moves this Court for an Order Shortening Time on the Debtor's Motion for an Order Approving Compromise of Claim.

Debtor is seeking court approval of a settlement of the lawsuit in King County Superior Court of Washington bearing Case No. 21-2-16957-7 SEA with defendants Nationstar Mortgage LLC d/b/a Mr. Cooper (**Mr. Cooper**), U.S. Bank National Association, as Trustee for Master Adjustable-Rate Mortgages Trust 2007-2 Mortgage Pass-Through Certificates, Series 2007-2 (**U.S. Bank**) concerning claims regarding the mortgage loan and foreclosure of her home located at 4534 NE 204th Pl, Lake Forest Park, WA 98155 ("Residence"). As approval of this settlement is necessary to allow the reverse mortgage to go forward as put forth in a separate motion, this also needs to be brought on shortened time. The reverse mortgage lender has Lender indicated that they will obtain an order by July 15th, 2022 to allow an orderly closing prior to July 31st as the issues in this reverse mortgage require additional

EX PARTE MOTION TO APPROVE
COMPROMISE OF CLAIM TO
SHORTEN TIME- 1

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complexity.

1. Exigent Circumstances: Because Judge Dore's next hearing date that provides for sufficient notice to creditors pursuant to Local Rules W.D. Wash. Bankr 9013-1 is not until July 15, 2022 on the Chapter 7 docket or Debtor runs the risk of not completing the reverse mortgage in time to approve the settlement agreement if the motion for shortened time is not granted. *See* Dkt No. 47-1, Declaration in support of Motion on shortened time or the Reverse Mortgage which is incorporated by reference as if fully contained herein.

2. Attorney Certification: The undersigned hereby certifies that the following efforts were made to communicate with the Chapter 13 Trustee: copies of the motion to allow this reverse mortgage and this motion to shorten time, and related documents were emailed to courtmail@seattlech13.com on July 11, 2022.

3. Counsel will include a copy of the Order Shortening Time with the Notice of Hearing on Debtor's Motion to Approve Compromise of Claim will be sent to all creditors.

WHEREFORE, Debtors request for an Order to Shorten Time for their Motion to Approve Reverse Mortgage and that the hearing be set for July 15, 2022 at 9:30 am with a Response date of July 14, 2022.

Dated this July 11, 2022.

/s/ Christina L Henry
Christina L Henry, WSBA# 31273
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EX PARTE MOTION TO APPROVE
COMPROMISE OF CLAIM TO
SHORTEN TIME- 2

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DECLARATION OF CHRISTINA L HENRY

I, Christina L Henry, declare as follows:

4. I am the Chapter 13 bankruptcy attorney for the debtor Joan Raider Rawlings and I have personal knowledge of the information in this declaration.

5. I emailed the entire packet for this motion, supporting declarations and request to shorten time to Chapter 13 Trustee at courtmail@seattlech13.com on July 11, 2022.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Executed this 11th day of July 2022 at Seattle, WA.

/s/ Christina L Henry
Christina L Henry, WSBA# 31273